

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

CROSS-MOTION FOR SUMMARY JUDGMENT

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (collectively “Plaintiffs”), by their attorneys, respectfully move this Court for summary judgment on Counts I, II, III and V of Plaintiffs’ Complaint pursuant to Fed. R. Civ. P. 56. As explained in the concurrently-filed supporting memorandum, the policy that Defendants used to select and approve residential applicants is discriminatory and any proffered business necessity advanced by Defendants justifying their policy is pretextual.

A proposed Order is attached.

Local Rule 7(E) Certification

Plaintiffs' counsel attempted to confer in good faith with counsel for Defendants regarding this Motion but counsel were unable to reach agreement.

DATED this 23rd day of December, 2016 Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of December, 2016, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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